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December 27, 2019

**via facsimile (973) 645-4549 and electronic filing**

Honorable Joseph A. Dickson, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Court Room MLK 2D  
Newark, NJ 07101


RE: Eady v. Tapfury, LLC, et al.  
Docket No.: 2:17-cv-13483-ES-JAD

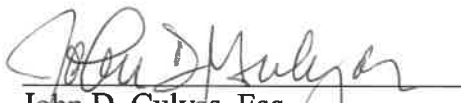
Dear Judge Dickson,

Kindly accept this joint submission on the status of the litigation in the above referenced matter. The Scheduling Order of October 9, 2019 specified document discovery to be completed by December 15, 2019. Defendant provided Rule 26 disclosure on October 30, 2019. Plaintiff has yet to provide Rule 26 disclosure. Although document discovery has not been completed the parties will be able to meet the fact discovery deadline of April 30, 2020.

The deposition of the individual defendant has tentatively been scheduled for March 12, 2020 at defense counsel's office in New York. Plaintiff anticipates one other deposition of an employee of defendant KickBack, Inc., but are awaiting confirmation that he is still employed. Deposition of the plaintiff, although not scheduled, is anticipated to be concluded during the month of February, following completion of document discovery.

Experts have yet to be retained by either party, but it is anticipated that plaintiff will have a single expert.

  
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